UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Gary Okimoto
Vice President, Honolulu Wood Treating, LCC
91-291 Hanua Street
Kapolei, HI 96707-1711

RE: May 3, 2016 Clean Water Act Inspection

Dear Mr. Okimoto,

Please find enclosed the Clean Water Act stormwater inspection and Spill Prevention Control and Countermeasures ("SPCC") inspection reports for the U.S. Environmental Protection Agency's ("EPA") May 3, 2016 visit to Honolulu Wood Treating, LLC ("HWT").

Based on the information gathered during our inspections, we have identified a number of compliance concerns, which are identified in Section III of the stormwater report and in the checklist of the SPCC report. EPA urges HWT to continue working with the Hawaii Department of Health Clean Water Branch to ensure that HWT has appropriate permit coverage. Additionally, EPA encourages HWT to obtain an SPCC plan as the facility stores more than 1,320 gallons of oil above ground and is likely subject to the SPCC rule. In order to help us better understand your perspectives on these concerns, please send us supplemental information and tell us about any actions you may have taken since our inspection. Please send your responses by mail or electronic mail within 30 days of receiving this letter regarding the stormwater inspection report and the SPCC inspection report to, respectively:

Colby Tucker
USEPA Region 9
Enforcement Division ENF 3-1
75 Hawthorne Street
San Francisco, CA 94105
Tucker.WilliamC@epa.gov

Connor Adams
USEPA Region 9
Enforcement Division ENF 3-2
75 Hawthorne Street
San Francisco, CA 94105
Adams.Connor@epa.gov

You may also contact Colby Tucker with any questions regarding the stormwater inspection at Tucker.WilliamC@epa.gov or (415) 972-3556 and Connor Adams with any questions regarding the SPCC inspection at Adams.Connor@epa.gov or (415) 947-4109.

Sincerely,

David Wampler, Manager
Water Enforcement Section II

Enclosures: Inspection reports w/ attachments

Cc: Matt Kurano, Hawaii Department of Health
Kyle Honda, City and County of Honolulu

EPA United States Environmental Protection Agency

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

INSPECTION REPORT

Inspection Date(s):	May 3, 2016		
Time:	**Entry:** 13:20	**Exit:** 15:45	
Media:	Water	Weather: Sunny, 75°F	
Regulatory Program(s)	CWA NPDES/Industrial Stormwater		
Company Name:	Honolulu Wood Treating LLC		
Facility or Site Name:	Honolulu Wood Treating LLC		
Facility/Site Physical Location:	91-291 Hanua Street		
(city, state, zip code)	Kapolei, HI 96707-1711		
Geographic Coordinates:	21°18'40.1"N 158°06'10.1" W		
Mailing address:	91-291 Hanua Street		
(city, state, zip code)	Kapolei, HI 96707-1711		
County:	Honolulu County		
Facility/Site Contact:	Gary Okimoto	808-792-6421	
	gary@hwthawaii.com		
	Dan Barnett	808-792-6436	
	dan@hwthawaii.com		
NAICS:			
SIC:	2491 (based on EPA site observations and separate CCH inspection performed in February 2016)		
Facility/Site Personnel Participating in Inspection:			
Gary Okimoto – Vice President, Dan Barnett – Sale & Technical Support			
Inspector(s):			
Colby Tucker (Lead)	Signature:	Date: July 19, 2016	
	Enforcement Section (ENF 3-1)	Inspector	(415) 972-3556
Connor Adams	Enforcement Section (ENF 3-2)	Inspector	(415) 947-4109
Supervisor Review:			
David Wampler	Signature:	Date: July 19, 2016	
	Enforcement Section (ENF 3-2)	Manager	(415) 972-3975

SECTION I: INTRODUCTION

The purpose of the inspection was to conduct an unannounced industrial storm water inspection Honolulu Wood Treating LLC (HWT) and evaluate the potential nexus of the facility's storm water runoff to Waters of the United States (WOTUS). At the time of inspection, HWT had no coverage under Hawaii Administrative Rules (HAR) 11-55, Appendix A and B, *NPDES General Permit Authorizing Discharges of Storm Water Associated with Industrial Activities* (NGPC).

Opening Conference

On May 3, 2016, Colby Tucker (Region 9 EPA, lead inspector) and Connor Adams (Region 9 EPA, inspector) (hereafter, "we" or "I") entered HWT's office building conjoined with the warehouse (see Attachment 1: Map Overview) at 13:20. Inspector Tucker asked an employee to speak with the company representative responsible for environmental compliance. We were pointed to Dan Barnett, who has the job title Sales & Technical Support. We identified ourselves to Mr. Barnett, stated the purpose of the visit, and asked Mr. Barnett to join in a meeting, the opening conference.

Mr. Barnett escorted the inspectors to a conference room and informed Gary Okimoto, Vice President Sales and Marketing of our presence. Mr. Okimoto was present throughout the opening conference and remainder of the inspection. I restated to Mr. Barnett and Mr. Okimoto that the purpose of the visit was to conduct an unannounced industrial storm water inspection. Mr. Barnett asked if the visit was in response to a City and County of Honolulu (CCH) inspection (See Attachment 2) conducted in February 2016. Inspector Adams stated that EPA was unaware of the CCH inspection schedule and the present inspection was part of a separate, neutral targeting effort. I inquired about the status of HWT's NGPC and Mr. Barnett stated that HWT received notice in November 2005 from Hawaii Department of Health (HDOH) that the state determined that HWT no longer need to file the No Exposure Certification Form (CWB-NOXP Form). Mr. Barnett confirmed that HWT does not have a current NGPC. I asked if HWT had developed a Storm Water Pollution Prevention Plan (SWPPP) or had any other documentation regarding storm water best management practices. Mr. Barnett and Mr. Okimoto stated they were unsure and Mr. Barnett left the conference to search for documents.

Mr. Okimoto proceeded to give an overview of the operations at HWT. HWT is a wood treatment and wholesale distributor of wood owned by Honsador Holding LLC. (Subject to SIC code 2491 as identified on the CCH inspection report.) HWT uses both oil borne and water borne wood preservation techniques. The oil borne solvent, "Td," is stored in a 14,000 gallon tank (See Attachment 6, Photograph Log: Photo 9). Inspector Adams informed Mr. Okimoto that this and potentially other tanks on site make the facility subject to §311(j)(1)(C) of the Clean Water Act, the Spill Prevention, Control and Countermeasure (SPCC) regulation. Mr. Okimoto stated that there is another 20,000 gallon storage tank that held water and stormwater in preparation of mixing with Tribor (a borate based wood preservation chemical) for wood treating (Photo 12).

The mixing of Tribor with water and/or stormwater occurs in tanks located in the Tank Farm (Photo 2).

Mr. Barnett returned with several documents: CCH inspection report dated February 19, 2016 (See Attachment 2), letter dated from December 21, 2005 from HDOH (See Attachment 3), letter dated February 4, 2000 from HDOH explaining NPDES Storm Water Phase II Final Rule Requirements, and the HWT Emergency Action and Fire Prevention Plan. The inspection team reviewed the documents and asked for copies of all except for the HWT Emergency Action and Fire Prevention Plan which was determined not to be relevant for industrial stormwater Clean Water Act regulations. The conclusion of the CCH inspection report identified that HWT needs an NPDES permit or a No Exposure Certification. The HDOH letter presented to be a "Conditional "No Exposure" Exclusion (CNEE)." Mr. Okimoto and Mr. Barnett pointed to this letter as their rationale for having neither a NGPC on file nor an up-to-date No Exposure Certification (NEC). HWT appeared to have operated with an NEC from 2000-2005.

After the opening conference concluded, Mr. Okimoto and Mr. Barnett led the inspectors on a site tour.

Section II: Observations

Facility Description and Site Tour

The HWT facility comprised of two buildings: an administrative building and a warehouse/office space (See Attachment 1: Map Overview). South of the warehouse is the employee parking area, staging area/overflow area for some of the industrial processes, and the transfer access point to the Tank Farm for petroleum based chemicals. There are two manholes in this area that appear paved over and/or sealed (Photo 3). Conversations with Mr. Barnett and Mr. Okimoto informed that the purpose and draining location of these manholes are unknown[1]. The Tank Farm held 13 vertical tanks within a concrete berm. These tanks held a combination of borate-based and oil-based wood treatment solutions, water, and storm water. South of the Tank Farm is a 20,000 gallon horizontal water tank. Directly to the west of the warehouse were six green horizontal treating vessels. Conversation with Mr. Okimoto indicated that only one tank, horizontal tank 3, is used for oil-based wood treatment—the other tanks are used for borate-based treatments.

Directly north of the horizontal treatment vessels was a bermed area, loosely in the shape of a triangle if viewed from overhead (See Attachment 1). The berm was about 6 inches high. Mr. Okimoto and Mr. Barnett said that rain water that falls in this area flows south to the area of the horizontal treating vessel where the water is captured and stored for future use in the wood treatment process. Mr. Barnett and Mr. Okimoto stated that treated wood drip dries in this

[1] Mr. Okimoto said in a follow-up email dated on May 4, 2016, "The two "wells" in the back next to the tank farm are sump pits that are used to pull water back into our systems. Rain water ponds in the back and we recapture that water for use in our treatment." (Attachment 5)

bermed area before exiting. We documented a stack of wood being removed from a treatment vessel (Photo 21) and observed it being removed without stopping from the bermed area to the yard with other piles of wood. The stack of wood appeared to be in the drying stage of the treatment process and no drips were apparent.

The area outside of the triangular bermed area is the staging area for wood entering treatment vessels and the drying area for treated wood. The area to the west of the bermed triangle and north of the warehouse slopes towards three drains (See Attachment 1, note Features 3-5). Mr. Okimoto and Mr. Barnett said this area was paved 15-20 years ago to address flooding issues. At the time of the paving, the drains were installed which are routed to a dry well, according to Mr. Barnett. Also present was a diesel tank (Photo 23) located about 30 feet to the north of the exit of the bermed area.

Near the northern administrative building was a manhole labeled "Storm Drain" (Photo 26). Mr. Barnett indicated that it was not connected to the local MS4, but part of the piping network draining to the dry well. The manhole cover was not removed during the inspection.

Mr. Barnett, Mr. Okimoto, and the inspection team returned to the conference room and conducted a concluding conference.

Section III. Areas of Concern

In the concluding conference, I discussed the following items outlined below.

1. We discussed the inspection team's concern with the manholes and drains around the facility, their respective flow paths and discharge locations, and the ability of the Facility representatives to communicate such information. We discussed this information may have implications regarding permit requirements for HWT.

2. We discussed HWT's uncertainty of the appropriate permit requirements for the facility based on a previous Conditional No Exposure Exclusion letter issued by HDOH (Attachment 3) and a more recent stormwater inspection conducted by City and County of Honolulu (Attachment 5). See Attachment 4 for the EPA Stormwater Phase II Final Rule which includes information about the Conditional No Exposure Exclusion.

Inspector Adams also discussed issues identified during the inspection relating to SPCC (a separate SPCC report has been created). We informed Mr. Barnett and Mr. Okimoto that EPA officials from other media may be visiting them within the week. Another EPA inspector from the UIC team visited later in the week to inspect the facility's injection well.

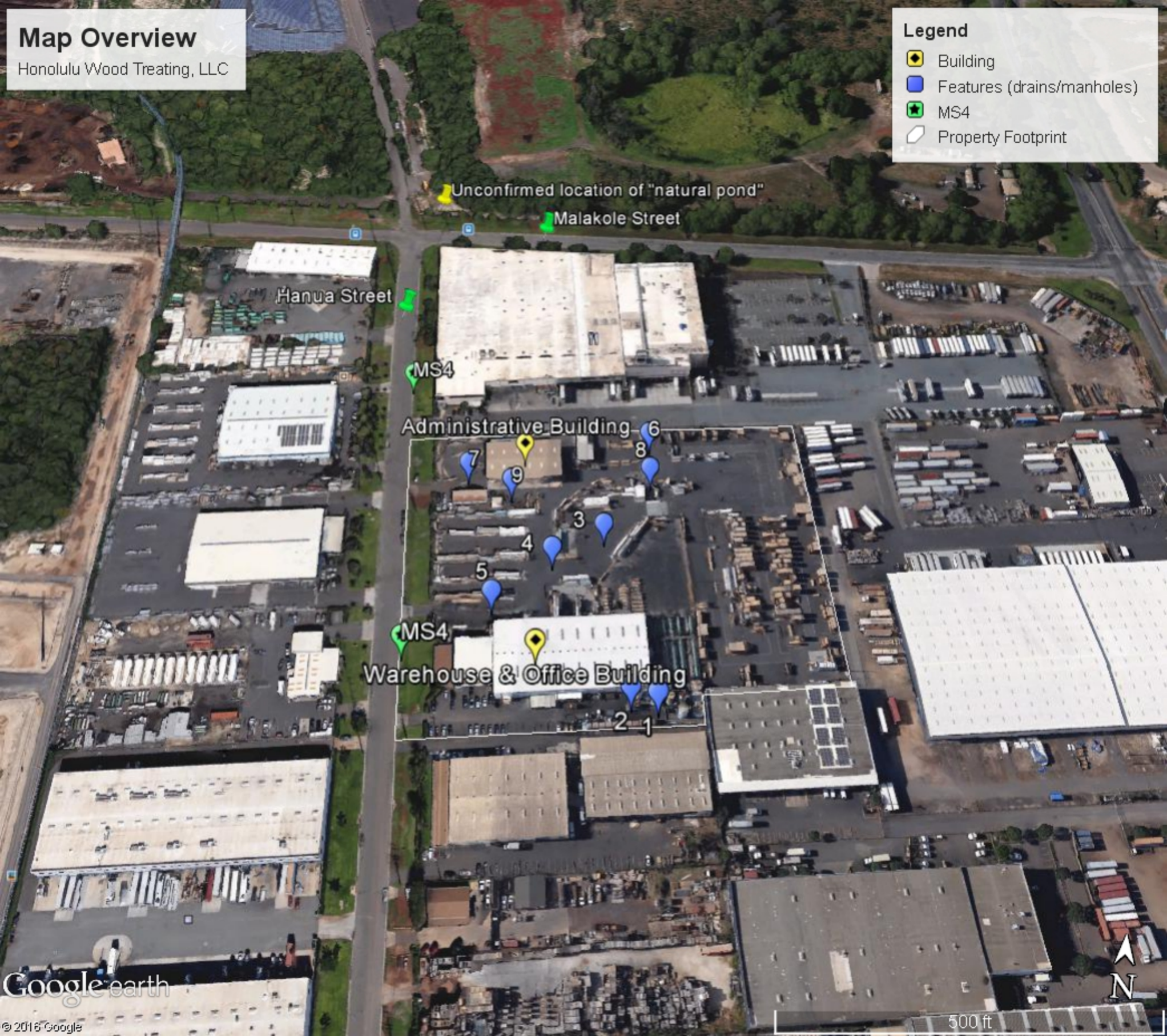
The onsite inspection concluded at 15:45 and we departed the facility. We traveled north to the corner of Malakole Street and Hanua street and observed standing water in what may be described as a "natural pond", which was language used in the HDOH CNEE letter (See

Attachments 1 and 3). The pond was about 75 feet by 75 feet. No drains or pipes were visible from the road. No other location with standing water was found north of Malakole Street from the road.

Section IV. List of Attachments

Attachment 1: Map Overview
Attachment 2: 2016.02.19 CCH Inspection Report
Attachment 3: Conditional No Exposure Exclusion Letter from HDOH to HWT
Attachment 4: EPA Stormwater Phase II Final Rule
Attachment 5: 2016.05.04 Letter from Mr. Okimoto to Colby Tucker
Attachment 6: Inspection Report Photograph Log

Attachment 1 – Map Overview


Map Overview
Honolulu Wood Treating, LLC
Legend
Building
Features (drains/manholes)
MS4
Property Footprint
Unconfirmed location of "natural pond"
Malakole Street
Hanua Street
MS4
Administrative Building
6
8
7
9
3
4
5
MS4
Warehouse & Office Building
2
1
N
500 ft
Google earth
© 2016 Google

Attachment 2 – 2016.02.19 CCH Inspection Report

WCT
5/3/16

DEPARTMENT OF FACILITY MAINTENANCE
STORM WATER QUALITY BRANCH
CITY AND COUNTY OF HONOLULU
1000 ULUOHIA STREET, SUITE 212 • KAPOLEI, HAWAII 96707
PHONE: (808) 768-3343 • FAX: (808) 768-3289 • Website: www.cleanwaterhonolulu.com

KIRK CALDWELL
Mayor

ROSS SASAMURA, P.E.
Director

EDUARDO MANGLALLAN
Deputy Director

INDUSTRIAL / COMMERCIAL INSPECTION REPORT

As part of its responsibilities under the Federal Clean Water Act, the City Department of Facility Maintenance is making inspections of industrial / commercial properties which may have discharges to the City storm drain system. If you have any questions, please contact the investigator whose name appears at bottom.

Date: 2/19/2016 State-Receiving Water: Mamala (West) Bay

Official use only	
TMK: 9-1-032:010	SIC Code: 2491

Site address (industrial area): 91-291 Hanua Street, Kapolei, Hawaii 96707

Name of firm: Honolulu Wood Treating, LLC

Storm Water Contact Person (title): Dan Barnett - Sale & Technical Support Phone No: 808-792-6436

Description of Business: Wood treatment and wholesale distribution of building products

SIC Code Description: Wood Preserving

Does facility need NGPC, NPDES or No-exposure certification (based on Standard Industrial Classification – SIC code) ☒Yes ☐No

If facility has Notice of General Permit Coverage (NGPC) or any applicable NPDES Permit Coverage:

Permit Number: Issue Date:

Storm Water Pollution Control Plan and Notice of Intent located at site: ☐Yes ☐No

Drain Connection to the City MS4: ☐Yes ☒No Drain Connection License: #

Storm Water from Facility goes to: Street: ☒Yes ☐No Drainage Ditch: ☐Yes ☒No Other: Dry well on site

DEFICIENCIES FOUND AT FACILITY: ☒ YES ☐ NO

☐ Illicit Discharge to City's storm drain system: **CORRECT BY:**

Discharge: ☐ Oil ☐ Grease ☐Wash water ☐ Soil / Sediment ☐Other:

Location of discharge:

☐ Unlicensed private storm drain connection to the City's storm drain system. Contact the Department of Planning and Permitting at 768-8106 to obtain license. You must obtain license within 90 days. **CORRECT BY:**

Location of drainage connection:

☒ NPDES Permit or No Exposure Certification Required. Contact the State Department of Health (DOH) Clean Water Branch at 586-4309 to obtain permit or certification. State DOH will determine the date at which deficiency must be corrected by.

GPS Coordinates of discharge Point: Lat: -158.103447 Long: 21.311552

☐ Other

Directives / Recommendations:

NOTIFY THE STORM WATER QUALITY BRANCH INVESTIGATOR WHEN CORRECTIVE ACTION IS COMPLETED

Kyle Honda / Kyle Honda 808-768-3265
Signature / Printed Name of Investigator Phone

(Rev 7/10/2015)

WCT
5/3/16

Site Visit:

1. Does the facility store chemical(s) that may enter the MS4 (oil – motor or cooking, hydraulic fluid, paint, etc.)☒ Yes ☐No

   Where are the chemicals located (storage cabinet, flammable container)? Flammable cabinet and above ground storage tanks

   What types of chemicals are stored? Diesel gas, paints and gasoline. Also wood treatment chemicals, such as, trucor and trib II.

   For facilities with chemicals are there Material Safety Data Sheets (MSDS) onsite? ☒Yes ☐No
   Are MSDS sheets located near chemicals? ☒Yes ☐No
   -Note MSDS sheets provide information on:
   - Accidental Release measures (Environmental precautions and methods for cleaning up)
   - Good housekeeping practices on handling and storage.

   How are the chemicals disposed of? Unitek picks up used oil. All other chemicals are used completely

   Best Management Practices (BMP's):
   - Spill Kits ☐
   - Secondary containment ☒
   - Oil Recycling Practice ☒
   - Employee Training ☐
   - Other:

2. Does facility have Permanent BMP's: ☐Yes ☒ No
   Type:
   - Oil / Water Separator ☐
   - Hydrodynamic Separator ☐
   - Vegetative Swale ☐
   - Other: Dry well

   Maintenance: In house

3. Are there automotive batteries on site? ☐Yes ☒No
   Are batteries stored with overhead cover or secondary containment? ☐Yes ☐No

4. Does facility maintain or wash vehicles ☒Yes ☐No Water goes to:

5. Dumpsters used by Facility: ☒Yes ☐No
   - Is the refuse dumpster communal ☐Yes ☒No
   - Are dumpsters covered? ☐Yes ☒No
   - Condition of dumpster or disposal area: ☒Good ☐Fair ☐Poor

6. Overall Housekeeping Practices (includes failure to properly contain possible contaminants, cleaning of spills and leaks, trash pickup, condition of gutters, conditions of catch basins, etc.):

   Facility Conditions: ☒Good ☐Fair ☐Poor

   Outside Conditions: ☒Good ☐Fair ☐Poor

7. Informational sheet(s) given to manager or point of contact ☒Yes ☐No

8. Do you discharge commercial industrial wastewater to sewers (public or private)? (e.g., oily waste, grease waste, low/high ph)
   ☐Yes ☒No ☐Don't know

   If "Yes", do you have an Industrial Wastewater Discharge Permit? ☐Yes ☐No ☐Don't know

Notes: Facility personnel stated that storm water from wood treatment area is captured and stored in above ground storage tanks for later use in their wood treatment process. Recommend obtaining and utilizing lids for trash bins to avoid contamination of storm water.

Attachment 3 – Conditional No Exposure Exclusion Letter from HDOH to HWT

WCT
5/3/16

LINDA LINGLE
GOVERNOR OF HAWAII

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EMD / CWB

12068PJLS.05

December 21, 2005

Mr. Robert J. Oliveira
Plant Manager
Honolulu Wood Treating Co., Ltd.
91-291 Hanua Street
Kapolei, Hawaii 96707

Dear Mr. Oliveira:

Subject: National Pollutant Discharge Elimination System (NPDES)
Conditional "No Exposure" Exclusion (CNEE)
Honolulu Wood Treating Co., Ltd.
91-291 Hanua Street, Kapolei, Hawaii
File No. HI 02BB293

The Department of Health, Clean Water Branch (CWB), acknowledges receipt on November 15, 2005, of the CWB-NPDES "No Exposure" Certification Form (CWB-NOXP Form) for the subject facility.

According to the files from File No. HI R22A267 (the number previously assigned to your facility), the Notice of Intent was withdrawn because the storm water runoff from the facility "goes north under Malakole Street to a natural pond location" (Honolulu Wood Treating Co., Ltd. letter, dated July 14, 1994). In 1994, it was determined that the natural pond was not considered to be a State water.

Based on this information, the CWB hereby terminates the processing of the CNEE renewal. If there is a discharge of storm water to State waters in the future, you will be required to submit a completed CWB-NOXP Form. Please continue to implement any Best Management Practices to minimize pollutants in your facility's storm water runoff.

WCT
5/3/16

If you have any questions, please contact Ms. Joanna L. Seto of the Engineering Section, CWB, at 586-4309.

Sincerely,

DENIS R. LAU, P.E., CHIEF
Clean Water Branch

JLS:np

c: Mr. Gerald Takayesu, Storm Water Quality Branch, Division of Environmental Quality, Department of Environmental Services, City and County of Honolulu [via fax 692-5520 only]
Ms. Mary C. Emerson, Campbell Estate [via fax 674-3111 only]

Attachment 4 – EPA Stormwater Phase II Final Rule

United States Environmental Protection Agency
Office of Water (4203)
EPA 833-F-00-015
January 2000 (revised December 2005)
Fact Sheet 4.0

Stormwater Phase II Final Rule

Conditional No Exposure Exclusion for Industrial Activity

Why Is the Phase I No Exposure Exclusion Addressed in the Phase II Final Rule?

The 1990 stormwater regulations for Phase I of the Federal stormwater program identify eleven categories of industrial activities that must obtain a National Pollutant Discharge Elimination System (NPDES) permit. Operators of certain facilities within category eleven (xi), commonly referred to as "light industry," were exempted from the definition of "stormwater discharge associated with industrial activity," and the subsequent requirement to obtain an NPDES permit, provided their industrial materials or activities were not "exposed" to stormwater. This Phase I exemption from permitting was limited to those facilities identified in category (xi), and did not require category (xi) facility operators to submit any information supporting their no exposure claim.

In 1992, the Ninth Circuit court remanded to EPA for further rulemaking the no exposure exemption for light industry after making a determination that the exemption was arbitrary and capricious for two reasons. First, the court found that EPA had not established a record to support its assumption that light industrial activity that is not exposed to stormwater (as opposed to all other regulated industrial activity not exposed) is not a "stormwater discharge associated with industrial activity." Second, the court concluded that the exemption impermissibly relied on the unsubstantiated judgment of the light industrial facility operator to determine the applicability of the exemption. These findings resulted in a revised conditional no exposure exclusion, the changes to which are described in this fact sheet.

Who is Eligible to Claim No Exposure?

As revised in the Phase II Final Rule, the conditional no exposure exclusion applies to ALL industrial categories listed in the 1990 stormwater regulations, except for construction activities disturbing 5 or more acres (category (x)).

What Is The Regulatory Definition of "No Exposure"?

The intent of the no exposure provision is to provide facilities with industrial materials and activities that are entirely sheltered from stormwater a simplified way of complying with the stormwater permitting provisions of the Clean Water Act (CWA). This includes facilities that are located within a larger office building, or facilities at which the only items permanently exposed to precipitation are roofs, parking lots, vegetated areas, and other non-industrial areas or activities. The Phase II regulatory definition of "no exposure" follows.

> ***No exposure*** is defined as all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products.

A storm-resistant shelter is not required for the following industrial materials and activities:

- ❑ Drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- ❑ Adequately maintained vehicles used in materials handling; and
- ❑ Final products, other than products that would be mobilized in stormwater discharges (e.g., rock salt).

The term "storm-resistant shelter," as used in the no exposure definition, includes completely roofed and walled buildings or structures, as well as structures with only a top cover but no side coverings, provided material under the structure is not otherwise subject to any run-on and subsequent runoff of stormwater. While the intent of the no exposure provision is to promote a condition of permanent no exposure, EPA understands certain vehicles could become temporarily exposed to rain and snow while passing between buildings. Adequately maintained mobile equipment (e.g., trucks, automobiles, forklifts, trailers, or other such general purpose vehicles found at the industrial site that are not industrial machinery, and that are not leaking contaminants or are not otherwise a source of industrial pollutants) can be exposed to precipitation or runoff. Such activities alone would not prevent a facility from certifying to no exposure. Similarly, trucks or other vehicles awaiting maintenance at vehicle maintenance facilities that are not leaking contaminants or are not otherwise a source of industrial pollutants, are not considered "exposed."

In addition, EPA recognizes that there are circumstances where permanent no exposure of industrial activities or materials is not possible and, therefore, under such conditions, materials and activities can be sheltered with temporary covers (e.g., tarps) between periods of permanent enclosure. The no exposure provision does not specify every such situation, but NPDES permitting authorities can address this issue on a case-by-case basis.

The Phase II Final Rule also addresses particulate matter emissions from roof stacks/vents that are regulated by, and in compliance with, other environmental protection programs (i.e., air quality control programs) and that do not cause stormwater contamination are considered not exposed. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control program) and evident in stormwater outflow are considered exposed. Likewise, visible "track out" (i.e., pollutants carried on the tires of vehicles) or windblown raw materials is considered exposed. Leaking pipes containing contaminants exposed to stormwater are deemed exposed, as are past sources of stormwater contamination that remain onsite. General refuse and trash, not of an industrial nature, is not considered exposed as long as the container is completely covered and nothing can drain out holes in the bottom, or is lost in loading onto a garbage truck. Industrial refuse and trash that is left uncovered, however, is considered exposed.

What is Required Under the No Exposure Provision?

The Phase II Final Rule represents a significant expansion in the scope of the original no exposure provision in terms of eligibility (as noted above) and responsibilities for facilities claiming the exclusion. Under the original no exposure provision, a light industry operator was expected to make an independent determination of whether there was "exposure" of industrial materials and activities to stormwater and, if not, simply not submit a permit application. An operator seeking to qualify for the revised conditional no exposure exclusion, including light industry operators (i.e., category (xi) facilities), must:

- ❑ Submit written certification that the facility meets the definition of "no exposure" to the NPDES permitting authority once every 5 years.
  - The Phase II Final Rule includes a four-page *No Exposure Certification* form that uses a series of yes/no questions to aid facility operators in determining whether they have a condition of no exposure. It also serves as the necessary certification of no exposure provided the operator is able to answer all the questions in the negative. EPA's *Certification* is for use only by operators of industrial activity located in areas where EPA is the NPDES permitting authority.
  - A copy of the *Certification* can be obtained from the EPA stormwater Web site (http://www.epa.gov/npdes/stormwater), the Stormwater Phase II Final Rule published in the *Federal Register* (Appendix 4), or by contacting the appropriate NPDES permitting authority.
- ❑ Submit a copy, upon request, of the *Certification* to the municipality in which the facility is located.
- ❑ Allow the NPDES permitting authority or, if discharging into a municipal separate storm sewer system, the operator of the system, to: (1) inspect the facility; and (2) make such inspection reports publicly available upon request.

Regulated industrial operators need to either apply for a permit or submit a no exposure certification form to be in compliance with the NPDES stormwater regulations. Any permit held becomes null and void once a certification form is submitted.

Even when an industrial operator certifies to no exposure, the NPDES permitting authority still retains the authority to require the operator to apply for an individual or general permit if the NPDES permitting authority has determined that the discharge is contributing to the violation of, or interfering with the attainment or maintenance of, water quality standards, including designated uses.

Are There Any Concerns Related to Water Quality Standards?

Yes. An operator certifying that its facility qualifies for the conditional no exposure exclusion may, nonetheless, be required by the NPDES permitting authority to obtain permit authorization. Such a requirement would follow the permitting authority's determination that the discharge causes, has a reasonable potential to cause, or contributes to a violation of an applicable water quality standard, including designated uses. Designated uses can include use as a drinking water supply or for recreational purposes.

Many efforts to achieve no exposure can employ simple good housekeeping and contaminant cleanup activities such as moving materials and activities indoors into existing buildings or structures. In limited cases, however, industrial operators may make major changes at a site to achieve no exposure. These efforts may include constructing a new building or cover to eliminate exposure or constructing structures to prevent run-on and stormwater contact with industrial materials and activities. Major changes undertaken to achieve no exposure, however, can increase the impervious area of the site, such as when a building with a smooth roof is placed in a formerly vegetated area. Increased impervious area can lead to an increase in the volume and velocity of stormwater runoff, which, in turn, can result in a higher concentration of pollutants in the discharge, since fewer pollutants are naturally filtered out.

The concern of increased impervious area is addressed in one of the questions on the *Certification* form, which asks, "Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? If yes, please indicate approximately how much area was paved or roofed over." This question has no affect on an operator's eligibility for the exclusion. It is intended only to aid the NPDES permitting authority in assessing the likelihood of such actions interfering with water quality standards. Where this is a concern, the facility operator and its NPDES permitting authority should take appropriate actions to ensure that water quality standards can be achieved.

What Happens if the Condition of No Exposure Is Not Maintained?

Under the Phase II Final Rule, the no exposure exclusion is conditional and not an outright exemption. Therefore, if there is a change in circumstances that causes exposure of industrial activities or materials to stormwater, the operator is required to comply immediately with all the requirements of the NPDES Stormwater Program, including applying for and obtaining a permit.

Failure to maintain the condition of no exposure or obtain coverage under an NPDES stormwater permit can lead to the unauthorized discharge of pollutants to waters of the United States, resulting in penalties under the CWA. Where a facility operator determines that exposure is likely to occur in the future due to some anticipated change at the facility, the operator should submit an application and acquire stormwater permit coverage prior to the exposed discharge to avoid such penalties.

For Additional Information

Contacts

☞ U.S. EPA Office of Wastewater Management
http://www.epa.gov/npdes/stormwater
Phone: 202-564-9545

☞ Your NPDES Permitting Authority. Most States and Territories are authorized to administer the NPDES Program, except the following, for which EPA is the permitting authority:

Alaska	Guam
District of Columbia	Johnston Atoll
Idaho	Midway and Wake Islands
Massachusetts	Northern Mariana Islands
New Hampshire	Puerto Rico
New Mexico	Trust Territories
American Samoa	

☞ A list of names and telephone numbers for each EPA Region and State is located at http://www.epa.gov/npdes/stormwater (click on "Contacts").

Reference Documents

☞ EPA's Stormwater Web Site
http://www.epa.gov/npdes/stormwater
- Stormwater Phase II Final Rule Fact Sheet Series
- Stormwater Phase II Final Rule (64 *FR* 68722)
- National Menu of Best Management Practices for Stormwater Phase II
- Measurable Goals Guidance for Phase II Small MS4s
- Stormwater Case Studies
- And many others

Attachment 5 – 2016.05.04 Letter from Mr. Okimoto to Colby Tucker

From: Gary Okimoto <gary@hwthawaii.com>
Sent: Wednesday, May 04, 2016 9:53 AM
To: Tucker, Colby
Subject: Honolulu Wood Treating visit
Attachments: removed.txt

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Colby,

Just wanted to reach out to let you know that I followed up on a couple of issues that were discussed yesterday.

1. Empty 55 gal barrels stored upside down outside in the parking lot have been triple washed with clean solvent and are awaiting a trip to the recycler. Solvent is then used in our treatment process.
2. The two "wells" in the back next to the tank farm are sump pits that are used to pull water back into our system. Rain water ponds in the back and we recapture that water for use in our treatment.
3. Containment pallets will be ordered today.

We do appreciate your visit and will be working to reach full compliance.

Mahalo,

Gary Okimoto
Senior Vice President

HONOLULU WOOD TREATING
91-291 Hanua Street / Kapolei, Hawaii 96707
Direct: (808) 792-6421 / Facsimile: (808) 682-4436 / Cell: (808) 282-7673
Email: mailto:gary@hwthawaii.com | www.hwthawaii.com

Attachment 6 – Inspection Report Photograph Log

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 1: Entrance to Honolulu Wood Treating LLC.

Photo 2: Tank farm. Visible are tanks for storing water and/or mixing with borate based wood treating chemicals.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 3: Located south of warehouse facing east. Oil slicks and staining present. Intermodal container is labeled “Petroleum Distilates, N.O.S.” (Photo 6). Call out show Features: Feature 1 is far frame and Feature 2 is near frame (refer to Attachment 1: Map Overview for all Features).

Photo 4: Close up of Feature 2 (see Attachment 1: Overview Map). Notice oily sheen.

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 5: Located south of warehouse facing east. Various pipes of unconfirmed origin located on palettes, racks, and the ground. Oil staining visible on asphalt.

Photo 6: Located south of warehouse facing north. Intermodal transport holding petroleum distillates.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 7: Located south of warehouse looking between intermodal container and receiving vessel. Notice oil staining on the ground.

Photo 8: Located south of warehouse looking between intermodal container and receiving vessel (north). Notice oil staining on the ground.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 9: Located south of warehouse looking northeast. View of tank that holds the petroleum distillates on site.

Photo 10: Located south of warehouse looking east. Container with liquid accumulation at the transfer area on the (direction) side of the property.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 11: Located south of warehouse. Close up of Feature 1 (see Attachment 1: Overview Map).

Photo 12: Located south of warehouse looking west. Call out arrows point to Feature 2 (right) (see Attachment 1: Overview Map), partially empty two ton borate bag (middle) and 20,000 gallon vessel used for rainwater retention (left). Notice oil staining on pavement.

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 13: Located south of warehouse looking south. Five buckets of unknown substance are open and exposed. Call out arrow shows southern berm separating HWT LLC property and adjacent property.

Photo 14: Located south of warehouse facing west. Empty container once containing permethrin, an insecticide and insect repellent.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 15: Located south of warehouse facing south. Empty drums, once containing hydrocarbons.

Photo 16: Located south of warehouse facing west. An employee does maintenance on a fork lift. Notice kitty litter containing oil spills.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 17: Located south of warehouse. On-going maintenance work on a fork lift. Notice kitty litter containing oil spills.

Photo 18: Inside warehouse. Drums of hydrocarbons on secondary containment structure.

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 19: Inside warehouse. Notice two ton bags of borate on palettes.

Photo 20: Located north of warehouse facing south. View of yard with rail tracks leading to the six green treatment vessels. Fork lift is preparing to remove wood seen in Photo 21. Call out arrow points to vessel seen in Photo 22. Call out lines show berms.

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 21: Located north of warehouse facing west. Treated wood exiting treatment vessel.

Photo 22: Located north of warehouse facing east. Open and exposed vessel used during part of the wood processing operation.

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 23: Located north of warehouse facing northwest. Diesel tank in secondary containment.

Photo 24: Located north of warehouse facing northwest. Notice treated wood stacked in center of photo. Call out arrow points to Feature 8 (see Attachment 1: Overview Map).

EPA United States Environmental Protection Agency

Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 25: Located north of warehouse facing northeast. Photo highlights Feature 3. Feature 8 is located under the call out arrow. (See Attachment 1: Overview Map).

Photo 26: Located north of warehouse. Photo shows Feature 9 (see Attachment 1: Overview Map). Manhole cover reads “Storm Drain.”

U.S. ENVIRONMENTAL PROTECTION AGENCY
SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

ONSHORE FACILITIES (EXCLUDING OIL DRILLING, PRODUCTION AND WORKOVER)

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for onshore facilities including Tier II Qualified Facilities (excluding facilities involved in oil drilling, production and workover activities) that meet the eligibility criteria set forth in §112.3(g)(2).

Separate standalone checklists address requirements for:
Onshore oil drilling, production, and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2);
Offshore drilling, production and workover facilities; and
Tier I Qualified Facilities (for facilities that meet the eligibility criteria defined in §112.3(g)(1))

Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for qualified facilities. These provisions are addressed in Attachment D.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Sections 112.8 and 112.12 specify requirements for spill prevention, control, and countermeasures for onshore facilities (excluding production facilities).

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment E at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Attachments

- Attachment A is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment C is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled operational equipment that chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment D is a checklist for Tier II Qualified Facilities.
- Attachment E is for recording additional comments or notes.
- Attachment F is for recording information about photos.

FACILITY INFORMATION			
FACILITY NAME: Honolulu Wood Treating LLC			
LATITUDE: 21.311199	LONGITUDE: -158.102322	GPS DATUM:	
Section/Township/Range:	FRS#/OIL DATABASE ID:	ICIS#:	
ADDRESS: 91-291 Hanua Street			
CITY: Kapolei	STATE: HI	ZIP: 96707-1711	COUNTY: Honolulu
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"): SAME			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE: (808)682-5704	FACILITY CONTACT NAME/TITLE: Gary Okimoto/ Senior V.P.		
OWNER NAME: Honsador Lumber LLC			
OWNER ADDRESS: 91-151 Malakole Road			
CITY: Kapolei	STATE: HI	ZIP: 96707	COUNTY: Honolulu
TELEPHONE: (808)682-2011	FAX: (808)682-5252	EMAIL:	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): Honolulu Wood Treating LLC			
OPERATOR ADDRESS: 91-291 Hanua Street			
CITY: Kapolei	STATE: HI	ZIP: 96707-1711	COUNTY: Honolulu
TELEPHONE: (808)682-5704	OPERATOR CONTACT NAME/TITLE: Gary Okimoto/ Senior V.P.		
FACILITY TYPE: Wood Preserving		NAICS CODE: 321114	
HOURS PER DAY FACILITY ATTENDED: 10hrs/day 7A-3:30P	TOTAL FACILITY CAPACITY: ~61,628 gallons		
TYPE(S) OF OIL STORED: Petroleum based solvents and diesel			
LOCATED IN INDIAN COUNTRY? ☐ YES ☑ NO RESERVATION NAME:			

INSPECTION/PLAN REVIEW INFORMATION		
PLAN REVIEW DATE: N/A	REVIEWER NAME: N/A	
INSPECTION DATE: 05/03/2016	TIME: 13:20	ACTIVITY ID NO:
LEAD INSPECTOR: Connor Adams		
OTHER INSPECTOR(S): Colby Tucker (EPA)		

INSPECTION ACKNOWLEDGMENT	
I performed an SPCC inspection at the facility specified above.	
INSPECTOR SIGNATURE:	DATE: 7/18/2016
SUPERVISOR REVIEW/SIGNATURE:	DATE: 7/18/2016

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** ☑ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States ☑ Yes ☐ No

AFFECTED WATERWAY(S): Mamala Bay (Pacific Ocean)	DISTANCE: .75 miles

FLOW PATH TO WATERWAY:

Flow would enter the storm drains on Hanua Street or dry wells (with unknown connections) on the property and potentially flow SSE to the ocean.

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers(as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☐ Yes ☑ No

FACILITY RESPONSE PLAN (FRP) APPLICABILITY—40 CFR 112.20(f)

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, **OR**

☐ The facility has a total oil storage capacity of at least 1 million U.S. gallons, **AND** at least one of the following is true:

- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
- ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
- ☐ The facility is located such that a discharge would shut down a public drinking water intake.
- ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☐ Yes ☐ No ☑ NA	FRP Number:

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria." ☐ Yes ☑ No

Comments:

SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)	
The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND**	☐ Yes ☐ No
In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had:	
• A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR**	☐ Yes ☐ No
• Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period[1]	☐ Yes ☐ No
IF ***YES*** TO ALL OF THE ABOVE, THEN THE FACILITY IS A TIER II QUALIFIED FACILITY[2] SEE ATTACHMENT D FOR TIER II QUALIFIED FACILITY CHECKLIST	

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3		
Date facility began operations: Unknown		
Date of initial SPCC Plan preparation: NA	Current Plan version (date/number): NA	
112.3(a)	**For facilities (except farms), including mobile or portable facilities:** • In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011** • Beginning operations after November 10, 2011, Plan prepared and fully implemented before beginning operations	☐ Yes ☑ No ☐ NA ☐ Yes ☐ No ☑ NA
	For farms (as defined in §112.2): • In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013** • Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013** • Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations	☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
112.3(d)	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: • PE is familiar with the requirements of 40 CFR part 112 • PE or agent has visited and examined the facility • Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 • Procedures for required inspections and testing have been established • Plan is adequate for the facility	☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA

PE Name:	License No.:	State:	Date of certification:

112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. *(Please note nearest field office contact information in comments section below.)*	☐ Yes ☑ No ☐ NA

Comments:

Facility representatives were unaware of the SPCC rule at the time of inspection and were unable to produce any documentation regarding SPCC rule compliance.

[1] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[2] An owner/operator who self-certifies a Tier II SPCC Plan may include environmentally equivalent alternatives and/or secondary containment impracticability determinations when reviewed and certified by a PE.

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[3]	☐ Yes ☑ No
If **YES**	• Was information submitted to the RA as required in §112.4(a)?[4]	☐ Yes ☐ No ☑ NA
	• Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c)	☐ Yes ☐ No ☑ NA
	• Date(s) and volume(s) of reportable discharges(s) under this section:	
	• Were the discharges reported to the NRC[5]?	☐ Yes ☐ No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	☐ Yes ☐ No ☑ NA
Comments:		

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	☐ Yes ☐ No
If **YES**	• Was the Plan amended within six months of the change?	☐ Yes ☐ No
	• Were amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years?	☐ Yes ☐ No ☐ NA
	Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)?	☐ Yes ☐ No ☐ NA
	Amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No ☐ NA
	Five year Plan review and evaluation documented?	☐ Yes ☐ No ☐ NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]*	☐ Yes ☐ No ☐ NA

Name:	License No.:	State:	Date of certification:
Reason for amendment:			
Comments: No SPCC plan.			

[3] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[4] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

[5] Inspector Note-Confirm any spills identified above were reported to NRC

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan[6]		☐ Yes ☐ No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		☐ Yes ☐ No ☐ NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)*		☐ Yes ☐ No ☐ NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.8(c)(2),112.8(c)(11), 112.12(c)(2), and 112.12(c)(11)	☐ Yes ☐ No ☐ NA	
If **YES**	• The Plan states reasons for nonconformance	☐ Yes ☐ No ☐ NA	
	• Alternative measures described in detail and provide equivalent environmental protection *(Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description)*	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA

Describe each deviation and reasons for nonconformance:

[6] May be part of the Plan or demonstrated elsewhere.

		PLAN	FIELD
112.7(a)(3)	Plan describes physical layout of facility and includes a diagram[7] that identifies: • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11)	☐ Yes ☐ No	☑ Yes ☐ No
	Plan addresses each of the following:		
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	☐ Yes ☐ No	☑ Yes ☐ No
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	☐ Yes ☐ No	☐ Yes ☑ No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	☐ Yes ☐ No	☑ Yes ☐ No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☐ Yes ☐ No	☐ Yes ☑ No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	☐ Yes ☐ No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☐ Yes ☐ No	
112.7(a)(4)	***Does not apply if the facility has submitted an FRP under §112.20:*** ☐ Yes ☐ No ☐ NA Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted.		
112.7(a)(5)	***Does not apply if the facility has submitted a FRP under §112.20:*** Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	☐ Yes ☐ No ☐ NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	☐ Yes ☐ No ☐ NA	

Comments:

112.7(a)(3)- Honolulu Wood Treating transfers petroleum based solvents from an intermodal container into bulk storage tanks via transfer hose without discharge prevention measures in place (Photo 6-8). Additionally, the facility was unable to provide me with any information regarding countermeasures for discharge discovery, response and clean-up.

[7] Note in comments any discrepancies between the facility diagram, the description of the physical layout of facility, and what is observed in the field

		PLAN	FIELD
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist. **For onshore facilities**, one of the following or its equivalent: • Dikes, berms, or retaining walls sufficiently impervious to contain oil; • Curbing or drip pans; • Sumps and collection systems; • Culverting, gutters or other drainage systems; • Weirs, booms or other barriers; • Spill diversion pond; • Retention ponds; or • Sorbent materials.		
	Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:		
	☑ Bulk storage containers	☐Yes ☐No ☐NA	☑Yes ☐No ☐NA
	☑ Mobile/portable containers	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	☐ Oil-filled operational equipment (as defined in 112.2)	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
	☑ Other oil-filled equipment (i.e., manufacturing equipment)	☐Yes ☐No ☐NA	☑Yes ☐No ☐NA
	☑ Piping and related appurtenances	☐Yes ☐No ☐NA	☑Yes ☐No ☐NA
	☐ Mobile refuelers or non-transportation-related tank cars	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
	☑ Transfer areas, equipment and activities	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	☐ Identify any other equipment or activities that are not listed above:	☐Yes ☐No ☐NA	☐Yes ☐No ☐NA
112.7(d)	Secondary containment for one (or more) of the following provisions is determined to be impracticable: ☐ General secondary containment §112.7(c) ☐ Bulk storage containers §§112.8(c)(2)/112.12(c)(2) ☐ Loading/unloading rack §112.7(h)(1) ☐ Mobile/portable containers§§112.8(c)(11)/ 112.12(c)(11)	☐Yes ☐No	
If **YES**	• The impracticability of secondary containment is clearly demonstrated and described in the Plan	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	• For bulk storage containers,[8] periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	(Does not apply if the facility has submitted a FRP under §112.20): • Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) **AND**	☐Yes ☐No ☐NA	
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA

Comments:

112.7(C)- No SPCC plan. The adequacy of in-place secondary containment around the bulk storage containers and piping on site as well as the oil filled manufacturing equipment (process vessels) is unknown (Photo 21). There was no specific secondary containment for mobile/portable containers or transfer areas at the time of inspection (Photo 15).

[8] These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	☐ Yes ☐ No	☐ Yes ☑ No
	Record of inspections or tests signed by supervisor or inspector	☐ Yes ☐ No	☐ Yes ☑ No
	Kept with Plan for at least 3 years (see Attachment B of this checklist)[9]	☐ Yes ☐ No	☐ Yes ☑ No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
112.7(g)	Plan describes how to: • Secure and control access to the oil handling, processing and storage areas; • Secure master flow and drain valves; • Prevent unauthorized access to starter controls on oil pumps; • Secure out-of-service and loading/unloading connections of oil pipelines; and • Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
112.7(h)	Tank car and tank truck loading/unloading rack[10] is present at the facility *Loading/unloading rack* means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.		☐ Yes ☑ No
If **YES** (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the **loading or unloading rack** to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA

Comments:

No SPCC plan. The facility representatives were unfamiliar with the SPCC rule.

[9] Records of inspections and tests kept under usual and customary business practices will suffice
[10] Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply

		PLAN	FIELD
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	☐ Yes ☐ No ☐ NA	
112.7(k)	Qualified oil-filled operational equipment is present at the facility[11] ☐ Yes ☑ No *Oil-filled operational equipment* means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g. , those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.		
If **YES**	Check which apply: • Secondary Containment provided in accordance with 112.7(c) ☐ Alternative measure described below (confirm eligibility) ☐		
112.7(k)	Qualified Oil-Filled Operational Equipment • Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date? ☐ Yes ☐ No ☑ NA • Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[12] ☐ Yes ☐ No ☑ NA		
	*If **YES** for either, secondary containment in accordance with §112.7(c) is required*		
	• Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	Does not apply if the facility has submitted a FRP under §112.20: • Contingency plan following 40 CFR part 109 (see Attachment C of this checklist) is provided in Plan **AND**	☐ Yes ☐ No ☐ NA	
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan	☐ Yes ☐ No ☐ NA	

Comments:

[11] This provision does not apply to oil-filled manufacturing equipment (flow-through process)

[12] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12		PLAN	FIELD
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge, **OR** • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Diked storage area drain valves are manual, open-and-closed design (not flapper-type drain valves)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, retained storm water is inspected and discharged per §§112.8(c)(3)(ii), (iii), and (iv) or §§112.12(c)(3)(ii), (iii), and (iv).	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
Undiked Areas (3)	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas.[13]	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(4)	If facility drainage not engineered as in (b)(3) (i.e., drainage flows into ponds, lagoons, or catchment basins) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge.[14]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
(5)	Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed?	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
If ***YES***	• Two "lift" pumps available and at least one permanently installed	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	• Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA

Comments:

112.8(b)(2)(3)-Drainage from the diked storage areas around the tank farm is managed by manual activated pumps and, at the time of inspection, the facility appeared to be managing and collection of water in the diked area by evaporation.

112.8(c)- The capacity and integrity of secondary containment around bulk storage tank installations appeared to be adequate based upon my visual observations. Due to the absence of an SPCC plan and PE certification, the technical adequacy of secondary containment is unknown.

112.8(c)/112.12(c) Bulk Storage Containers ☐ NA

Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment A of this checklist.

(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Diked areas sufficiently impervious to contain discharged oil **OR**	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA

[13] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[14] These provisions apply only when a facility drainage system is used for containment; otherwise mark NA

		PLAN	FIELD
(3)	Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse?	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
If **YES**	• Bypass valve normally sealed closed	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	• Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	• Bypass valve opened and resealed under responsible supervision	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	• Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3)	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
(4)	For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281):		
	• Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	• Regular leak testing conducted	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
(5)	The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
(6)	• Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• Comparison records of aboveground container integrity testing are maintained	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• Container supports and foundations regularly inspected	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
	• Records of all inspections and tests maintained[15]	☐Yes ☐No ☐NA	☐Yes ☑No ☐NA
Integrity Testing Standard identified in the Plan:			
112.8(c)(6)-No tank integrity testing documentation was available at the time of inspection. The facility should reference industry standards and develop a tank integrity protocol.			
112.12 (c)(6)(ii) *(Applies to AFVO Facilities only)*	Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions: • Subject to 21 CFR part 110; • Elevated; • Constructed of austenitic stainless steel; • Have no external insulation; and • Shop-fabricated.	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections.[16]	☐Yes ☐No ☐NA	☐Yes ☐No ☑NA

[15] Records of inspections and tests kept under usual and customary business practices will suffice

		PLAN	FIELD
(7)	Leakage through defective internal heating coils controlled: • Steam returns and exhaust lines from internal heating coils that discharge into an open watercourse are monitored for contamination, **OR** • Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
(8)	Each container is equipped with at least one of the following for liquid level sensing: • High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities; • High liquid level pump cutoff devices set to stop flow at a predetermined container content level; • Direct audible or code signal communication between container gauger and pumping station; • Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; or • Regularly test liquid level sensing devices to ensure proper operation.	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
(9)	Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
(11)	Mobile or portable containers positioned to prevent a discharge as described in §112.1(b). Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA ☐ Yes ☑ No ☐ NA
112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process			
(1)	Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating Buried piping installed or replaced on or after August 16, 2002 is also cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281 Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
(2)	Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
(3)	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction	☐ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	☐ Yes ☐ No ☐ NA ☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA ☐ Yes ☐ No ☑ NA
(5)	Vehicles warned so that no vehicle endangers aboveground piping and other oil transfer operations	☐ Yes ☐ No ☐ NA	☐ Yes ☑ No ☐ NA
Comments:			

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ATTACHMENT A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

Containers and Piping

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check aboveground container foundation for: cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check all piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.8(d) or 112.12(d).)

Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check drainage systems for: an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

Check retention and drainage ponds for: erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b).

Container ID/ General Condition[16] Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections
see attachment			

[16] Identify each tank with either an A to indicate aboveground or B for completely buried

ATTACHMENT A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE (CONT.)

Documentation of Field Observations for Containers and Associated Requirements

Container ID/ General Condition[17] Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

[17] Identify each tank with either an A to indicate aboveground or B for completely buried

ATTACHMENT B: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

	Inspection or Test	Documentation		Not Applicable
		Present	Not Present	
112.7–General SPCC Requirements				
(d)	Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made	☐	☐	☑
(d)	Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made	☐	☐	☑
(h)(3)	Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack	☐	☐	☑
(i)	Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe	☐	☐	☑
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges	☐	☐	☑
112.8/112.12–Onshore Facilities (excluding oil production facilities)				
(b)(1), (b)(2)	Inspection of storm water released from diked areas into facility drainage directly to a watercourse	☐	☐	☑
(c)(3)	Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events	☐	☐	☑
(c)(4)	Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112	☐	☐	☑
(c)(6)	Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records	☐	☑	☐
(c)(6), (c)(10)	Regular visual inspections of the outsides of aboveground containers, supports and foundations	☐	☑	☐
(c)(6)	Frequent inspections of diked areas for accumulations of oil	☐	☑	☐
(c)(8)(v)	Regular testing of liquid level sensing devices to ensure proper operation	☐	☑	☐
(c)(9)	Frequent observations of effluent treatment facilities to detect possible system upsets that could cause a discharge as described in §112.1(b)	☐	☐	☑
(d)(1)	Inspection of buried piping for damage when piping is exposed and additional examination of corrosion damage and corrective action, if present	☐	☐	☑
(d)(4)	Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces	☐	☑	☐
(d)(4)	Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement	☐	☐	☑

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ATTACHMENT C: SPCC CONTINGENCY PLAN REVIEW CHECKLIST ☐ NA

40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

	109.5–Development and implementation criteria for State, local and regional oil removal contingency plans[18]	Yes	No
(a)	Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☐	☐
(b)	Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	☐	☐
(1)	The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☐	☐
(2)	A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☐	☐
(3)	Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)).	☐	☐
(4)	An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☐	☐
(c)	Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	☐	☐
(1)	The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☐	☐
(2)	als and supplies that would be required to remove the maximum oil discharge to be anticipated.	☐	☐
(3)	Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☐	☐
(d)	Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:	☐	☐
(1)	Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	☐	☐
(2)	Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☐	☐
(3)	A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☐	☐
(4)	Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☐	☐
(5)	Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☐	☐
(e)	Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐	☐

[18] The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

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ATTACHMENT D: TIER II QUALIFIED FACILITY CHECKLIST ☑ NA

TIER II QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(b)		
112.6(b)(1)	**Plan Certification:** Owner/operator certified in the Plan that:	☐Yes ☐No
(i)	He or she is familiar with the requirements of 40 CFR part 112	☐Yes ☐No ☐NA
(ii)	He or she has visited and examined the facility[19]	☐Yes ☐No ☐NA
(iii)	The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the requirements of this part	☐Yes ☐No ☐NA
(iv)	Procedures for required inspections and testing have been established	☐Yes ☐No ☐NA
(v)	He or she will fully implement the Plan	☐Yes ☐No ☐NA
(vi)	The facility meets the qualification criteria set forth under §112.3(g)(2)	☐Yes ☐No ☐NA
(vii)	The Plan does not deviate from any requirements as allowed by §§112.7(a)(2) and 112.7(d), except as described under §112.6(b)(3)(i) or (ii)	☐Yes ☐No ☐NA
(viii)	The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.	☐Yes ☐No ☐NA
112.6(b)(2)	**Technical Amendments:** The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge	☐Yes ☐No ☐NA
If **YES**	• Certification of technical amendments is in accordance with the self-certification provisions of §112.6(b)(1).	☐Yes ☐No ☐NA
(i)	A PE certified a portion of the Plan (i.e., Plan is informally referred to as a hybrid Plan)	☐Yes ☐No ☐NA
If **YES**	• The PE also certified technical amendments that affect the PE certified portion of the Plan as required under §112.6(b)(4)(ii)	☐Yes ☐No ☐NA
(ii)	The aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change	☐Yes ☐No ☐NA
If **YES**	*The facility no longer meets the Tier II qualifying criteria in §112.3(g)(2) because it exceeds 10,000 U.S. gallons in aggregate aboveground storage capacity.*	
	The owner/operator prepared and implemented a Plan within 6 months following the change and had it certified by a PE under §112.3(d)	☐Yes ☐No ☐NA
112.6(b)(3)	**Plan Deviations:** Does the Plan include environmentally equivalent alternative methods or impracticability determinations for secondary containment?	☐Yes ☐No ☐NA
If **YES**	Identify the alternatives in the hybrid Plan:	
	• Environmental equivalent alternative method(s) allowed under §112.7(a)(2);	☐Yes ☐No ☐NA
	• Impracticability determination under §112.7(d)	☐Yes ☐No ☐NA
112.6(b)(4)	• For each environmentally equivalent measure, the Plan is accompanied by a written statement by the PE that describes: the reason for nonconformance, the alternative measure, and how it offers equivalent environmental protection in accordance with §112.7(a)(2);	☐Yes ☐No ☐NA
	• For each secondary containment impracticability determination, the Plan explains the reason for the impracticability determination and provides the alternative measures to secondary containment required in §112.7(d)	☐Yes ☐No ☐NA
	AND	
(i)	PE certifies in the Plan that:	
(A)	He/she is familiar with the requirements of 40 CFR Part 112	☐Yes ☐No ☐NA
(B)	He/she or a representative agent has visited and examined the facility	☐Yes ☐No ☐NA
(C)	The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.	☐Yes ☐No ☐NA
Comments:		

[19] Note that only the person certifying the Plan can make the site visit

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ATTACHMENT E: ADDITIONAL COMMENTS

Attachment 1: Overview Map

Attachment 2: Photo log

Attachment 3: HWT Tank Inventory

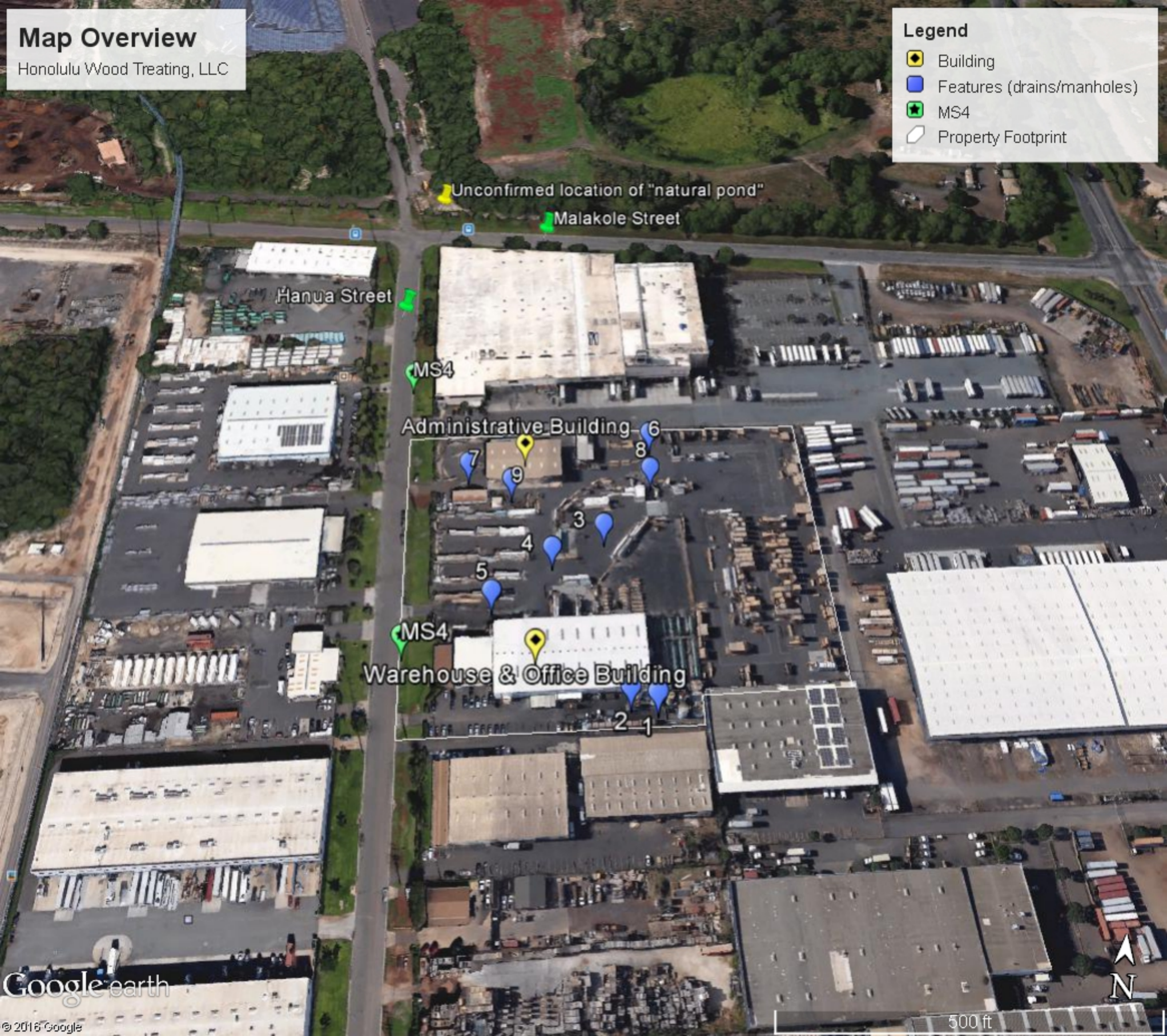
ATTACHMENT E: ADDITIONAL COMMENTS (CONT.)

ATTACHMENT F: PHOTO DOCUMENTATION NOTES

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description
All	Connor Adams	05/03/2016	Various	see attachment

ATTACHMENT F: PHOTO DOCUMENTATION NOTES (CONT.)

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description


Map Overview
Honolulu Wood Treating, LLC
Legend
Building
Features (drains/manholes)
MS4
Property Footprint
Unconfirmed location of "natural pond"
Malakole Street
Hanua Street
MS4
Administrative Building
6
8
7
9
3
4
5
MS4
Warehouse & Office Building
2
1
N
500 ft
Google earth
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INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 1: Entrance to Honolulu Wood Treating LLC.

Photo 2: Tank farm. Visible are tanks for storing water and/or mixing with borate based wood treating chemicals.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 3: Located south of warehouse facing east. Oil slicks and staining present. Intermodal container is labeled “Petroleum Distilates, N.O.S.” (Photo 6). Call out show Features: Feature 1 is far frame and Feature 2 is near frame (refer to Attachment 1: Map Overview for all Features).

Photo 4: Close up of Feature 2 (see Attachment 1: Overview Map). Notice oily sheen.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 5: Located south of warehouse facing east. Various pipes of unconfirmed origin located on palettes, racks, and the ground. Oil staining visible on asphalt.

Photo 6: Located south of warehouse facing north. Intermodal transport holding petroleum distillates.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 7: Located south of warehouse looking between intermodal container and receiving vessel. Notice oil staining on the ground.

Photo 8: Located south of warehouse looking between intermodal container and receiving vessel (north). Notice oil staining on the ground.

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INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 9: Located south of warehouse looking northeast. View of tank that holds the petroleum distillates on site.

Photo 10: Located south of warehouse looking east. Container with liquid accumulation at the transfer area on the (direction) side of the property.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 11: Located south of warehouse. Close up of Feature 1 (see Attachment 1: Overview Map).

Photo 12: Located south of warehouse looking west. Call out arrows point to Feature 2 (right) (see Attachment 1: Overview Map), partially empty two ton borate bag (middle) and 20,000 gallon vessel used for rainwater retention (left). Notice oil staining on pavement.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 13: Located south of warehouse looking south. Five buckets of unknown substance are open and exposed. Call out arrow shows southern berm separating HWT LLC property and adjacent property.

Photo 14: Located south of warehouse facing west. Empty container once containing permethrin, an insecticide and insect repellent.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 15: Located south of warehouse facing south. Empty drums, once containing hydrocarbons.

Photo 16: Located south of warehouse facing west. An employee does maintenance on a fork lift. Notice kitty litter containing oil spills.

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INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 17: Located south of warehouse. On-going maintenance work on a fork lift. Notice kitty litter containing oil spills.

Photo 18: Inside warehouse. Drums of hydrocarbons on secondary containment structure.

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INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 19: Inside warehouse. Notice two ton bags of borate on palettes.

Photo 20: Located north of warehouse facing south. View of yard with rail tracks leading to the six green treatment vessels. Fork lift is preparing to remove wood seen in Photo 21. Call out arrow points to vessel seen in Photo 22. Call out lines show berms.

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Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 21: Located north of warehouse facing west. Treated wood exiting treatment vessel.

Photo 22: Located north of warehouse facing east. Open and exposed vessel used during part of the wood processing operation.

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Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG

Honolulu Wood Treating LLC

Photo 23: Located north of warehouse facing northwest. Diesel tank in secondary containment.

Photo 24: Located north of warehouse facing northwest. Notice treated wood stacked in center of photo. Call out arrow points to Feature 8 (see Attachment 1: Overview Map).

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Region 9 Enforcement Division

INSPECTION REPORT PHOTOGRAPH LOG
Honolulu Wood Treating LLC

Photo 25: Located north of warehouse facing northeast. Photo highlights Feature 3. Feature 8 is located under the call out arrow. (See Attachment 1: Overview Map).

Photo 26: Located north of warehouse. Photo shows Feature 9 (see Attachment 1: Overview Map). Manhole cover reads “Storm Drain.”

Received 5/3/16
3:00pm

HONOLULU WOOD TREATING STORAGE TANK
INFORMATION AS OF_____

Tank #	Location	Size	Gal/Foot	Capacity	Contents
1	Tank Farm	12 x 50	846	42300	Hi-Bor
2	Tank Farm	12 x 30	846	25380	Hi-Bor
3	Tank Farm	12 x24	846	20304	TD-II 0.1
4	Tank Farm	16 x 28	1504	42112	Hi-Bor
5	Tank Farm	18.5 x 15	2009	30135	Hi-Bor
6	Tank Farm	18.5 x 15	2009	30135	Hi-Bor
7	Tank Farm	12 x 20	846	16920	Hi-Bor
8	Tank Farm	10.5 x 30	648	19440	Effluent Water
9	Tank Farm	18.5 x 15	2009	30135	Hi-Bor
10	Tank Farm	8 x 9	376	3384	Hi-Bor Mix (no storage)
11	Tank Farm	10.5 x 30	648	19440	City Water Storage
12	Tank Farm	15 x 13	1338	17394	Emergency water over-flow
15	Tank Farm	10 x 13	588	7644	Empty (fiber-glass)
16	Tank Farm	10 x 14	581	8134	Vacuum pump recir. water
17	Tank Farm	12 x 28	846	23688	Mineral Sprits 0.1
20	Ware-house	-------	-----	600	~~MB Mix~~ Tank (aluminum)
21	Ware-house	-------	-----	600	Clear-bor (aluminum)
22	Parking Lot	100 x 102	400	40800	Emergency water over-flow
23	Yard	------	-----	1600	Diesel Fuel
24	Yard	------	-----	575	Propane (Oahu Gas)

Xfer Tank

All tanks are above ground, steel construction unless as noted.

TD-II operation Equip 16,036 gal

CYLINDER INFORMATION as of

	CYLINDER 1	CYLINDER 2	CYLINDER 3	CYLINDER 4	CYLINDER 5	CYLINDER 6
MANUFACTURE	IGGS AKRO	Hawaii Weld Co.	Rothschild	United Pipe	Nat'l Bd.	Nat'l Bd.
DATE OF MAN.	1959	1966	1965	1957	1974	1974
SERIAL NUMBER	5544	1049	25326	212	26049	26058
MAX PRESSURE	150 PSI @650 F	150 PSI @230F	200 PSI @300F	150 PSI	200 PSI @300F	200PSI @300F
LENGHT	48 FEET	60 FEET	76 FEET	124 FEET	110 FEET	110 FEET
DIAMENTER	8 FEET	8 FEET	8 FEET	7 FEET	8 FEET	8 FEET
NO. TRAMS	5	8	6		8	8
TRACK SIZE	30"	25"	24"	31"	30"	30"
AVG. BOARD FEET	12000	7500	4000	16000	15000	15000
VAC. PUMP	NASH	NASH	NASH	SIHI	SIHI	SIHI
PRESSURE PUMP	Worthington	Grundfos (vertical)		Worthington	Chesterton	Chesterton
FILL PIPE DIA.	6"	6"	6"	8"	8"	8"
NO. GAL. TO FILL	18048	12660	16036	35588	23210	23210
TANK NO./NO.'S	#1	#2	#3	#4	#5 and 9	#6
GALLON/FOOT	846	846	846	1504	2009	2009
SOLUTION TYPE	HIBOR	HIBOR	TD II		HIBOR	HIBOR